

**No. 4:21-CR-5-O**

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**IN THE UNITED STATES DISTRICT COURT,  
NORTHERN DISTRICT OF TEXAS**

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**UNITED STATES OF AMERICA**

**v.**

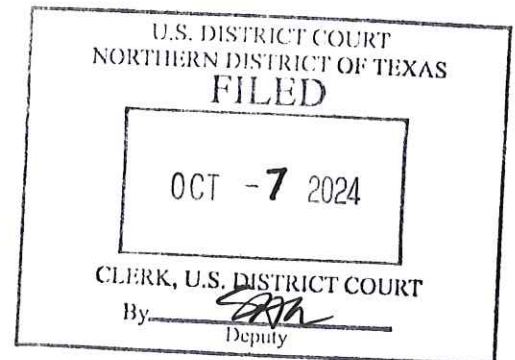
**THE BOEING COMPANY  
Defendant**

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**MOTION TO DISQUALIFY JUDGE REED O'CONNER**

**SUBMITTED BY: ANTHONY KEYTER  
(BOEING CRIME VICTIM / PROSECUTOR QUI TAM  
/ BOEING SENIOR INSTRUCTOR PILOT, RETIRED).**

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**ANTHONY P. KEYTER  
6200 SOUNDVIEW DR, R201  
GIG HARBOR, WA 98335**

**OCTOBER 5, 2024**

### **MOTION TO DISQUALIFY**

Boeing Crime Victim / Prosecutor Qui Tam, Anthony Keyter, respectfully moves this Court, pursuant 28USC455 and 28USC144, to disqualify Judge Reed O'Conner from this case: United States v. The Boeing Company. The Judge's impartiality might reasonably be questioned in this proceeding. He has shown favor to the Boeing Company and is a co-perpetrator in Boeing's crimes.

Criminal charges were filed with this Court against the Boeing Company on the following dates: 2/6/23 (Docket # 186); 2/13/23; 2/27/23; and 7/27/24 (Docket # 229). Judge Reed O'Conner was requested to address and terminate those crimes pursuant his legal duties under the United States statutes and the Federal Rules of Criminal Procedure.

Judge Reed O'Conner willfully failed to perform his legal duties in terms of his Oath of Office. The erring Judge instead facilitated and enabled the Boeing crimes to continue; he protected the Boeing Company and its law-breaking officials from prosecution and allowed the ongoing serious crimes to proceed unabated; and he assisted the criminal offenders to escape justice. By his actions and inaction where action was legally due, Judge Reed O'Conner was rendered an accessory to Boeing's unaddressed past crimes and an accomplice to Boeing's presently ongoing crimes. As accomplice and/or accessory to Boeing crimes, Judge Reed O'Conner cannot be impartial in his hearing of the case.

Pursuant statutes 28USC455 & 28USC144, United States Judge Reed O'Conner shall disqualify himself from proceedings in which his impartiality might reasonably be questioned.

### **AFFIDAVIT IN SUPPORT OF MOTION TO DISQUALIFY JUDGE REED O'CONNER**

The Boeing Company has engaged in serious offenses against the United States and international flying and investing public. Boeing's crimes were presented to Judge Reed O'Conner on several occasions {2/6/23; 2/13/23; 2/27/23; and 7/27/24} with the request that

the Judge perform his judicial duties under law in order to terminate those crimes and to bring the perpetrators to justice. Boeing's past and ongoing crimes are summarized in the Dossier of Crimes, Volume III, Chapter 42.1.17 (as updated on 7/27/24). This summarized criminal complaint is attached hereto as *Appendix 1*.

Judge O'Conner was obligated under statute 18USC3041<sup>1</sup> and Rules 4<sup>2</sup> & 41<sup>3</sup> of Federal Rules of Criminal Procedure to arrest the offenders and to bring them before the Court for a preliminary hearing. A motion for arrest was submitted to Court but Judge O'Conner deliberately ignored that motion. Judge O'Conner willfully failed to arrest the offenders or to schedule a preliminary hearing. Judge O'Conner instead protected the offenders from prosecution and assisted them to escape justice. His deliberate failure to perform his duties under his oath facilitated and enabled the Boeing crimes to continue unabated.

For aiding and abetting the Boeing offenders in ongoing crimes, Judge O'Conner is rendered an accomplice under statute 18USC2 and is punishable as a principal for the ongoing crimes detailed below in the Dossier of Crimes, Volume III, Chapter 42.1.17 (as updated on 7/27/24). In addition, knowing that offenses against the United States had been committed, Judge O'Conner relieved, comforted and assisted the offenders in order to hinder and prevent their apprehension, trial or punishment, and is rendered an accessory after the fact, pursuant 18USC3, to the offenses presented in Dossier of Crimes, Volume III, Chapter 42.1.17 (as updated on 7/27/24).

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<sup>1</sup> 18USC3041 - States in relevant part: "for any offense against the United States, the offender may, by any justice or judge of the United States ... be arrested and imprisoned".

<sup>2</sup> FRCr.P., Rule 4. - Rule 4 (a) states: "If the complaint or one or more affidavits filed with the complaint establishes probable cause to believe an offense has been committed and that the defendant committed it, the judge *must* issue an arrest warrant to an officer authorized to execute it". Rule 4 (c) states: Such warrant must "command that the defendant be arrested and brought without unnecessary delay before a judge".

<sup>3</sup> FRCr.P., Rule 41- "After receiving an affidavit or other information, a magistrate judge or a judge of a state court *must* issue the warrant if there is probable cause to search and seize a person or property under Rule 41(c)". [Rule 41(c) – Evidence of a crime.]



***Criminal Complaint Filed Against Judge O’Conner***

In addition to being an accomplice and/or an accessory to the Boeing Company crimes, Judge O’Conner has engaged as principal offender in crimes of his own accord. A criminal complaint is herewith filed against Judge O’Conner for the violations below. Judge O’Conner:

1. ***Violated 28USC453, his ‘Oath of Office’***, for deliberately failing to ‘administer justice without respect to persons, and deliberately failing to faithfully and impartially discharge and perform all the duties incumbent upon him as judge under the Constitution and laws of the United States.’
2. ***Violated 18USC3771, Crime Victim’s Rights***, for denying the rights of Boeing crime victim Anthony Keyter to be heard in a public hearing on October 11, 2024; the right to be reasonably protected from the accused; the right to full and timely restitution as provided by law; the right to proceedings free from unreasonable delay; and the right to confer with the attorney for the Government in the case.
3. ***Violated the 14<sup>th</sup> Amendment of the Constitution***, for willfully denying the right to due process and protection of the laws to the American people – protection of the laws the Boeing Company is in breach of.
4. ***Violated 18USC241 - Conspiracy against Rights***, by joining with the Boeing Company and the United States Attorneys in the matter, and oppressing the American people’s rights to due process and protection of the laws, which rights are secured to them by the Constitution and laws of the United States.
5. ***Violated 18USC242 - Deprivation of Rights***, by willfully subjecting the American people to the deprivation of the right to due process and protection of the laws as secured by the Constitution or laws of the United States – the laws that the Boeing Company are in breach of.



6. ***Violated 18USC1512 (c)(2) -Tampering with a witness, victim, or an informant:*** for corruptly or otherwise obstructing and impeding the official proceedings in case #4:21-cr-0, or attempting to do so, by deliberately not bringing the perpetrators to justice before the Court in preliminary hearing, and not arresting them or otherwise dealing with their crimes. Judge O’Conner should be fined under this title or imprisoned not more than 20 years, or both.
7. ***Violated 18USC2383 – Insurrection against the laws of the United States:*** in joining with others in authority who have failed to bring the Boeing Company to justice, as is demonstrated in the criminal complaint presented below in ***Appendix I***. The deeds of those who have rebelled against the laws of the United States, constitute a broad ‘*insurrection against the laws*’, which insurrection is fully described in the 2,400 pages of the ***Dossier of Crimes, USA - filed with this Court on 2/27/23 (with Judge O’Conner) for his action in this case.*** The Boeing Company and Judge O’Conner, find themselves at the center of this major criminal endeavor active within industry and the US Government. None of the many crimes presented have been investigated or prosecuted, or had the laws applied upon them by Judge O’Conner. He simply joined the insurrection against the laws of the United States and concealed the crimes.

***The Laws Requiring Disqualification of Judge O’Conner***

The above matters all point to Judge O’Conner not being fit to judge this case: 04:21-cr-5-O.

The statutes requiring Judge O’Conner’s disqualification and recusal, state:

Statute 28USC455 (re disqualification of judges) states:

*“(a) Any justice, judge, or magistrate of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.”*

Statute 28USC144 (re recusal of judges) states:

*“Whenever a party to a proceeding in a court makes and files a timely and sufficient affidavit that the judge before whom the matter is pending has a personal bias or prejudice either against him or in favor of any adverse party, such judge shall proceed no further therein, but another judge shall be assigned to hear such proceeding.”*

28USC453 (re judge's oath of office), provides that:

*Each justice or judge of the United States shall take the following oath or affirmation before performing the duties of his office: "I, (name), do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as \_\_\_\_\_ under the Constitution and laws of the United States. So help me God."*

**Conclusion**

Under the statutes 28USC455 & 28USC144, Judge O'Conner is obligated to disqualify himself from any hearings in Case No. 4:21-cr-5-O; or in any other case, for that matter. Pursuant the US Constitution – Article III, Section 1, quote: "The judges, both of the Supreme and inferior courts, shall hold their offices during good behaviour". Judge O'Conner is not in good behaviour due to the crimes he has committed and is committing together with the Boeing Company. ***Judge O'Conner is unlawfully holding office.***

Respectfully Submitted,



Anthony P. Keyter  
Boeing crime victim /Prosecutor Qui Tam/  
Boeing Company Senior Instructor Pilot, Retired.

**APPENDIX 1**

**Chapter 42.1.17  
of the Dossier of Crimes, USA, Volume III**

**AFFIDAVIT OF COMPLAINING WITNESS  
/ CRIMINAL COMPLAINT**

**ONGOING CRIMINAL CONSPIRACY  
BETWEEN BOEING AND THE US GOVERNMENT**

**ANTHONY P. KEYTER  
COMPLAINING WITNESSES /  
PROSECUTOR QUI TAM**

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## 1. INTRODUCTION

Despite great technical and financial achievements, The Boeing Company is not without culpability in serious criminal wrongdoing. In recent years, greed and short-sighted indifference has tarnished the name of this 100-plus year-old company. Short-cuts in its manufacturing processes, and drive for profits regardless of the adverse consequences on safety, have left Boeing culpable in homicide; fraud; obstruction of justice; and serious subversive crimes under the laws of the United States and of Washington State; and culpable in crimes against humanity under the Rome Statute of the International Criminal Court.

The Boeing Company has not operated in a vacuum on its own. Boeing is in *ongoing criminal conspiracy* with several elements and institutions of the United States Government who are fully informed and who are enabling Boeing to commit continuing crimes. Those continuing crimes adversely affect the international standing of the United States and its people; poses grave risk to air travelers in Boeing aircraft worldwide; the crimes defraud international investors and prospective investors in the Boeing Company and stock exchanges upon which Boeing is listed; and, threatens the stability of the world's financial and investment markets. The virulent and violent criminal conspiracy further threatens the safety of witnesses and the security of evidence against the perpetrators. The conspiracy sharply degrades international law and order as other countries and world leaders become embroiled in the associated and rapidly escalating international criminality and its affects.

One of the direct effects of the ongoing Boeing / US Government criminal conspiracy is the death, the murder, of 507 people and attempted murder (grave injury) of another 189 people internationally, in four completely avoidable air accidents on Boeing aircraft. Another serious effect of the Boeing / US Government criminal conspiracy is the hundreds of billions of dollars of ongoing fraud on four major stock exchanges. A third result of the Boeing / US Government conspiracy is the subversive crimes committed against the United States of seditious conspiracy, insurrection against the laws of the United States, and treason upon the United States, perpetrated by more than 15,000 US Government officials.

The United States Government uses the assets of a corrupt Presidency, corrupt Department of Justice, FBI, Congress, and Court System (including the US Supreme Court), to achieve its aims of providing complete impunity to the Boeing Company and, importantly, impunity to its own malfeasant government officials. All these institutions are fully informed and their officials are fully implicated in the Boeing crimes and/or the cover up thereof, including the heinous crime of mass murder.

A direct legal outflow of these subversive crimes perpetrated by top US Government officials is that the present United States Administration / Government *is unlawful* pursuant the US laws and its own Constitution. A consequence of the Boeing Company criminality and impunity offered by its criminal co-conspirator (the US Government) is that the Boeing Commercial Airplanes is illegally doing business in Washington State and is defrauding the United States and its people, its investors, Boeing airline customers, and its international trading partners. These menacing consequences of the ongoing criminal conspiracy will be dealt with in a few words below.

A disquieting consequence of the ongoing Boeing / US Government crimes is that there is an existent threat against the lives of witnesses and whistleblowers. One such example is briefly presented in Section 4.1 dealing with seditious conspiracy. The combination of crimes



demonstrates unmistakable *state-supported tyranny upon the populace*, which adversely affects the whole of American society and people further afield.

The full extent of the Boeing / US Government criminal conspiracy is meticulously documented over the past 18 years in a 2,400-page tome titled '*the Dossier of Crimes*'. This dossier should be read as if fully incorporated in this criminal complaint. The dossier provides prima facie evidence of the Boeing / US Government criminal conspiracy where the US Government has not investigated or prosecuted, and where criminal charges have been suppressed and some 231 criminal complaints have been wrongfully, and at times by force, concealed by state and federal government officials.

## 2. THE PERPETRATORS

### ***BOEING PERPETRATORS***

1. ***The Boeing Company*** and its Board of Directors, Executive Council, and Boeing Commercial Aircraft leadership team:-
  - a. ***Board of Directors:*** Robert A Bradway; David L. Calhoun; Lynne Doughtie; David Gitlin; Lynn J. Good; Stayce D Harris; Akhil Johri; David L Joyce; Lawrence W. Kellner (Chair); Steven Mollenkopf; John M. Richardson; Sabrina Soussan; Ronald A. Williams. All other directors since 8 March 2006.
  - b. ***CEO and Executive Council:*** David L. Calhoun (Pres and CEO); Brian West; Bertrand-Marc Allen; William Ampofo; Uma Amuluru; Michael Arthur; Brian Besanceney; Stephen E. Biegun; Leanne Caret; Ted Colbert; Michael Ambrose; Stanley Deal; Michael Delaney; David Dohnalek; Susan Doniz; Brett Gerry; Greg Hyslop; Darrin Hostetler; Elizabeth Lund; Howard McKenzie; Brian Moran; Carole Murray; Brendan Nelson; Ziad Ojakli; William Osborne; Stephanie Pope; Chris Raymond; Brian West; Scott Stocker; Edward Dandridge; John Demers, Corporate Secretary. All other Executive Council Members since 8 March 2006.
  - c. ***Boeing Commercial Airplanes:*** Stephanie Pope; Stanley A Deal; Brian Baird; Conrad Chun; Joelle Denney; Matt Cooper; Pradeep Fernandes; Mike Flemming; Linda Hapgood; Werndy Lonergan; Elizabeth Lund; Rob Martin; Howard McKenzie; Ihssane Mounir; Carole A Murray; Kimberley Pastega; Mike Sinnet; Scott Stocker; Padraic Fennelly; Ramki Ramaswami.

### ***US GOVERNMENT ACCOMPLICES***

#### ***2. President Biden and Cabinet***

President Biden; VP Harris; Secretaries: Antony Blinken; Janet Yellen; Lloyd Austin; Merrick Garland; Deb Haaland; Tom Vilsack; Gina Raimondo; Marty Walsh; Xavier Becerra; Marcia Fudge; Pete Buttigieg; Jennifer Granholm; Miguel Cardona; Denis McDonough; Alejandro Mayorkas; Michael Regan; Avril Haines; Katherine Tai; Linda Thomas-Greenfield; Cecilia Rouse; Isabel Guzman; Shalanda Young; Chief of Staff Ron Klain; WH Counsel Stuart Delery. US Presidents and their Cabinets hearkening back to 8 March 2006, when the first Boeing crime and fraud on the stock exchanges was reported, which has since been left unaddressed.



**3. US Congress**

All 535 Members of 117<sup>th</sup> US Congress and all members hearkening back to when the first Boeing crime and fraud on the stock exchanges was reported to them, which report and all reports since then, were left unaddressed.

**4. Securities and Exchange Commission**

*Chairman:* Gary Gensler; *Commissioners:* Hester Peirce; Caroline Crenshaw; Mark Uyeda; Jaime Lizaragga; Principal Officers; Administrative Law Judges. Chairmen and Commissioners hearkening back to 8 March 2006, when the first Boeing crime and fraud on the stock exchanges was reported and was left unaddressed.

**5. Department of Justice:** Attorney General Merrick Garland; Dep. AG John Carlin; IG Horowitz.; Associate AG Mathew Congelo; Acting Asst. AG Nicholas McQuad; Deputy Assistant AG's; and: US Attorneys General and top US DOJ officials from the time when Boeing crimes and fraud was first reported to them.

**6. FBI:** Director Christopher Wray; Dep. Dir. David Bowdich; Ass. Dep. Dir Paul Abbate; Chief of Staff Paul Murphy; Ombudsman Monique Bookstein; Catherine Bruno (Integrity and Compliance); Stuart Platt (Professional Responsibility); Calvin Shivers (Crim. Investigation Division). Seattle Special Agent in Charge Jay S. Tabbs. Director Mueller and top FBI officials from the time when Boeing Crimes and fraud was first reported to them.

**7. US Supreme Court:** Chief Justice Roberts; Justice Samuel Alito; Justice Clarence Thomas; Justice Sonia Sotomayor; Justice Elena Kagan; Justice Neil Gorsuch; Justice Brett Kavanaugh; Justice Coney Barrett; Justice Ketanji Brown Jackson; Clerks Office: Scott Harris; Lisa Nesbit; all other Clerks Assistants. US Chief Justice and Associate Justices from the time when Boeing Crimes and fraud was first reported to them.

### 3. THE CRIMES

Criminal offenses in this Complaint are dealt with in two parts: *(a) Past Boeing crimes* described in *Section 4*, which have willfully not been dealt with by the US Government (by the Presidency, the DOJ, FBI, SEC, Congress, or the courts); and *(b) Ongoing Boeing crimes* which have similarly been concealed by the US Government, leaving a grave risk upon society, dealt with in *Sections 5*.

***Past Crimes***

Boeing and the Boeing Board of Directors and Executives have played a leading role in a broader and virulent criminal conspiracy involving the following crimes:

*Fraud on a large scale; obstruction of justice, 18USC1519; theft of court record; tampering with a witness; retaliation against a witness; contempt of court; perjury; conspiracy to commit offenses; conspiracy to kidnap; conspiracy to murder; conspiracy against rights; deprivation of rights; misprision of felony; treason; misprision of treason; seditious conspiracy; insurrection against the laws; accessory after the fact to offenses of their government co-conspirators as detailed in the 'Dossier of Crimes'; crimes*

*against humanity of mass murder in the death of 507 people; crimes against humanity of other inhumane acts in the grave injury of 189 innocent civilians; DOJ 'Deferred Prosecution Agreement'.*

Some of these unaddressed crimes are again summarized in Section 4 as part of this Complaint as an aide memoire and for completeness. The offenses are otherwise fully described in the ***Dossier of Crimes, Volume III, Chapter 42***, together with the other offenses not summarized in this Complaint.

#### ***Ongoing Crimes***

*Ongoing violation of: seditious conspiracy; fraud in the mount of \$249.88 billion on three stock exchanges; Securities Act, Sections 17(a)(2) and 17(a)(3); Revised Code of Washington, RCW 9a.28.40; SEC 'cease-and-desist' order; DOJ 'Plea Agreement'; USDC Northern Texas order; Boeing ongoing conspiracy with stock exchanges; Boeing ongoing criminal conspiracy with the US Government to cover-up fraud and unaddressed past crimes; Boeing ongoing criminal conspiracy with Alaska Airlines; Boeing 'ongoing' criminal conspiracy to defraud the United States; Boeing's ongoing criminal corporate culture: Boeing / US Government ongoing criminal conspiracy to murder the prosecutor qui tam, Anthony Keyter.*

### **4. UNADDRESSED PAST CRIMES OF THE BOEING COMPANY**

#### **4.1. BOEING / US GOVERNMENT 'SEDITIONOUS CONSPIRACY'**

The Boeing Company and agents of the United States Government acted in concert in several attempts to kidnap and murder a witness to crimes perpetrated by a top US Government official, namely, President George W Bush. The United States Code defines a seditious conspiracy as follows, with the relevant parts underlined:

***18USC2384 - Seditious Conspiracy:*** *If two or more persons in any State or Territory, or in any place subject to the jurisdiction of the United States, conspire to overthrow, put down, or to destroy by force the Government of the United States, or to levy war against them, or to oppose by force the authority thereof, or by force to prevent, hinder, or delay the execution of any law of the United States, or by force to seize, take, or possess any property of the United States contrary to the authority thereof, they shall each be fined under this title or imprisoned not more than twenty years, or both.*

#### ***Murder Ordered by President GW Bush***

On February 9<sup>th</sup>, 2006, (Prosecutor Qui Tam) Anthony Keyter filed a 'Petition for Rehearing' with the US Supreme Court in a case against President Bush (case no. 05-140), together with a Criminal Complaint which addressed extensive theft of court records. Those documents significantly increased the risk of public exposure and prosecution of President Bush and his co-conspirators. Within 24 hours of those documents being filed in the US Supreme Court, President Bush and his agents initiated a criminal plot to retaliate against the Petitioner, Anthony Keyter, with intent to kill him as primary witness to their crimes, in order to thwart the course of justice and administration of the laws. The execution of that plot commenced in



the US Supreme Court and unfolded through the offices of the White House, the Boeing Company, and the Federal Aviation Administration.

Under orders from President Bush, White House aids and FBI agents contacted the Boeing Company, Anthony Keyter's employer at that time where he worked as Senior Instructor Pilot. In a mutually beneficial arrangement, officers of the Boeing Company immediately embarked upon an attempt to inveigle him to an area away from his normal workplace, there to unlawfully seize him (kidnap him) in collaboration with and in execution of the plot to murder him. Boeing was offered an attractive contract/ compensation to facilitate this iniquitous conduct and the Boeing Board acquiesced to the request. This act violated the US statutes on (a) kidnapping, 18USC1201; (b) tampering with a witness 18USC1512 (a)(1)(A); and (c) retaliation against a witness 18USC1513; (d) conspiracy to murder 18USC1117; (e) attempted murder 18USC1111; and (e) seditious conspiracy, 18USC2384.

The first attempt to kidnap and murder Anthony Keyter (initiated by officers of the Boeing Company as proxies for President Bush and corrupt FBI agents) was foiled and resulted in further criminal charges being filed. A second attempt was undertaken by the prospective government assassins through the Federal Aviation Administration, in an effort to prevent information relating to these federal offenses from reaching law enforcement and the courts. The second kidnap and murder attempt was also abortive, but those attempts succeeded in destroying Anthony Keyter's livelihood and 17-year career as Senior Instructor Pilot with the Boeing Company. Subsequent hard evidence indicates that the kidnap and murder plot still remains in place on the date of this updated Complaint.

Details of the kidnap and murder plot are further described in the *'Dossier of Crimes', Volume III, in Chapter 1 and Chapters 41 - 44*. The Boeing Company and FAA officers involved, and their FBI and other co-conspirators, are listed in Chapter 3 of the dossier. A considerable amount of detail of events and evidence of the kidnap attempts is available to investigators. Overt audio tapes of conversations with Boeing managers and FAA officials clearly indicate the conclusions on intent and reveal the involvement of (former) Attorney General Gonzales and agents from his Justice Department and FBI.

The first two foiled kidnap and murder attempts were respectively commanded, facilitated, directed by President Bush, Chief Justice Roberts, Attorney General Gonzales, and FBI Director Mueller and executed by the Boeing Company. There remains a grim threat and a high likelihood of further retaliation against Anthony Keyter on behalf of the seditious conspirators, including the likelihood of a break-in and theft of incriminating documents; or removal of incriminating evidence from his office with a phony search warrant corruptly obtained; and a real possibility of executing the ongoing kidnap and murder plot, the trap of which remains intact to this day, as mentioned.

A key figure in the criminal plot, the former President of Boeing Commercial Airplanes, later joined the board of *The Ford Motor Company* and implicated that company's board members in the criminality. (See the Dossier of Crimes, Vol. III, Chapter 43).

#### ***Third Party Participation in Murder Attempt***

Besides the Boeing Company and President Bush and his government agents, a third party was directly involved in these kidnap and murder attempts, namely *Air India*. During the latter half of 2005 and the first half of 2006 officials from Air India pressured and incited



Boeing to act to silence and prevent Anthony Keyter's testimony against lawlessness within Air India. Air India sought to suppress a damning Flight Safety Report authored by him in his capacity as Senior Boeing Company Instructor Pilot, and sought to suppress knowledge of their violations of the Indian Aviation Act. (See the *Dossier of Crimes, Vol. III, Chapter 42.2*).

In an illegal and violent conspiracy to murder, the Boeing Company acquiesced to the incitement by Air India in order to facilitate and protect its \$11 billion aircraft deal with Air India at the time. That incitement occurred *simultaneous to the pressure and incitement by President Bush upon the Boeing Company to facilitate retaliatory action against Anthony Keyter*. Thus, the incitement by Air India upon the Boeing Company merged with the incitement by President Bush upon Boeing. Boeing's responses to that dual incitement are not distinguishable. The suppressed flight safety warnings were later to play a crucial role in the death (the murder) of 158 passengers and crew of Air India Flight IX-812.

Because of the direct involvement of Attorney General Gonzales and FBI agents under Director Robert Mueller, the United States did nothing to investigate and prosecute the Boeing / US Government assassination attempts. That remains a fact until this day. Boeing thus has blackmail potential over its partner in crime: the US Government.

#### **4.2. MURDER ON AIR INDIA FLIGHT IX-812**

On the morning of May 22, 2010, Air India Express Flight IX-812, on a scheduled passenger flight from Dubai, overran the runway and crashed while landing at Mangalore International Airport, India. One hundred and fifty eight (158) passengers and crew died in the avoidable accident. The Court of Inquiry into the accident determined that, *inter alia*, two dominant contributory causes to the accident were: a) crew fatigue and its concomitant effects, and b) numerous violations of Standard Operating Procedures for flight.

Flight IX-812 was conducted within a climate of unsafe aircraft operations in Air India resulting from a culture of lawlessness which originated within its senior management and which filtered down to flight crews by the exceedingly poor example of management. Flight safety warnings, pertinent to the wellbeing of passengers and crew aboard Flight IX-812, were issued by Captain Anthony Keyter some time prior to the accident, an industry specialist and instructor pilot from the Boeing Company. The safety warnings specifically addressed the issues of: a) crew fatigue and, b) habitual violations of the aircraft rules. The report sternly warned of the impending consequences if the safety issues were not remedied.

However, those flight safety warnings were violently suppressed by the Boeing Company and the US Federal Aviation Administration, by coercion and retaliation and two abortive attempts to kidnap and murder Captain Anthony Keyter as author of those warnings, in order to keep him silent and suppress his potential testimony in the courts. Consequently, the flight safety warnings were never disseminated and corrective actions were never instituted which most certainly would have saved the lives of the passengers and crew who died in the crash of Flight IX-812.

Air India officials did not act alone in the suppression of the safety warnings and in the malicious attempts upon the life of the author of those warnings. They acted via the Boeing Company as surrogate and in collusion with United States Government officials in a concurrent and overlapping criminal endeavor to assassinate the witness Anthony Keyter, and

in that way to silence his testimony on flight safety violations as well as other criminal wrongdoing *within all three organizations*: Boeing, Air India, and the US Government.

The suppression of the safety warnings by Boeing contributed significantly to the cause of death of the 158 who perished on Flight IX-812. Those persons responsible for that 'cause' knew that it was so imminently dangerous that it would, in all probability, cause death and yet they suppressed the safety warnings with extreme indifference to human life and without any excuse for incurring the risk. Their lawless and violent acts *constitute murder* pursuant Section 300 of the Indian Penal Code; Statute 18USC1111 of the United States Code; and statute RCW 9A.08.030 (1)(b) of the Revised Code of Washington where Boeing Commercial Airplanes is based.

***Murder charges*** were filed against principal perpetrators from Air India, the Boeing Company, and the US government; and accomplices or accessories who rendered criminal assistance to the principal offenders and who made it possible for the murders to occur, and/or, who aided the perpetrators to escape justice. Filed with the US Government and the courts, those charges were concealed in order to protect Boeing and its officials from prosecution.

The charges remain suppressed but pending in the United States Supreme Court in the Boeing Company Mass Murder Case; and remain suppressed by President Biden and his Cabinet, the DOJ, the FBI, the SEC, and the US Congress.

#### ***4.3. MURDER ON ASIANA FLIGHT 214***

On Saturday, July 6, 2013, Asiana Flight 214, a Boeing 777 on a scheduled passenger flight from Seoul, South Korea, crashed while attempting to land at San Francisco International Airport. Three people were killed as a direct result of the accident and 181 were gravely injured. Criminal misconduct on the part of the Boeing Company prior to the events of July 6, 2013, played a significant role in the accident and is in large part to blame for the crash of Asiana Flight 214.

Murder charges were filed in the death of the three Asiana 214 passengers who perished; and attempted murder charges are filed for the injury of 181 people. Prosecutor Qui Tam Anthony Keyter filed the charges pursuant his legal duties under the United States Code 18USC4 and the Revised Code of Washington RCW 9.69.100. The charges supplemented the existing murder charges filed against the Boeing Company relating to the death (the murder) of 158 passengers and crew on Air India Flight IX-812. Both the Asiana and Air India crashes and murder charges arose from similar and ongoing criminal misconduct within Boeing which underlies both the Asiana Flight 214 and Air India Flight 812 accidents. That criminal misconduct common to both air accidents was Boeing's suppression of known flight safety warnings and pertinent safety information which in both cases led to the deaths of passengers and crew as a consequence of that suppression.

#### ***The Asiana Crash***

During approach to landing on runway 28L at San Francisco International Airport on July 6, 2013, Asiana 214, hit the seawall prior to reaching the runway because it was too low and too slow on the final approach. Amongst other reasons, there were three prominent and obvious causes in series, why Asiana 214 was flying too low and too slow.



### ***The First Cause***

The *first reason* why Asiana 214 was too low and too slow was because the flight crew failed to monitor and timeously correct deviations in their altitude and their airspeed. However, there were two pertinent reasons which were equally responsible for the flight crew having failed to sufficiently monitor their airspeed. Those two pertinent causes of the accident are *ascribed to the Boeing Company*. Without those causes the accident would most likely have been avoided.

### ***The Second Cause***

The *second major reason* why Asiana 214 was too low in height and too slow in airspeed was because the auto-throttles in reality *did not* maintain the airspeed the pilots had commanded. Technically, this happened because the pilots found themselves in a situation (a) not trained for in the simulator (during Boeing Simulator Training), (b) likely not previously encountered in the aircraft as it was not recognized, and (c) which was not described in the Flight Crew Training Manual or Operating Manual of the Boeing 777 aircraft.

This was a *failure of the Boeing Company* which contributed in a major way to the accident. The condition is sometimes described by those who have encountered the situation before, as a 'trap' for unsuspecting pilots. It is obvious that the pilots of Asiana 214 were not familiar with that so-called 'trap'. It is referred to by those who have encountered the unusual situation as the '*Flight Level Change trap*'. (The full explanation of the so-called trap for B777 pilots is of a technical nature which can be elucidated during criminal investigation and/or trial).

### ***The Third Cause***

The *third major reason* for Asiana Flight 214 being too low and too slow on their final approach was that the auto-throttles failed to provide '*slow speed protection*' to the aircrew as it was expected to do (and was demonstrated during training to do), despite being armed to provide that protection. Notwithstanding the failure of the pilots to monitor and correct their altitude and airspeed, if the Boeing 777 auto-throttle system had maintained the commanded airspeed and had operated to provide slow speed protection (designed as a last resort back-up), the disaster could have and most likely would have been averted. This was another failure *attributable to the Boeing Company* which contributed in a major way to the accident.

### ***Boeing Company Culpability***

Thus, two very obvious anomalies or inconsistencies appeared back to back in the auto-throttle system of Asiana 214 which were major contributors to the accident; and without which the accident would very likely have been avoided. The Boeing Company was aware of those anomalies and as manufacturer and as training company to Asiana Airlines, had a definite responsibility to act upon the anomalies. Usually, when an aircraft displays such quirks or anomalies, the manufacturer would invent a fix for it; or alternatively, if not a serious anomaly, the pilots would be informed and trained to deal with the incongruity.

For reasons of their own, most likely *favoring their commercial interests*, Boeing officials suppressed knowledge of the auto-throttle anomalies prior to the accident and did not make that knowledge public. No mention of the anomalies was made in the Flight Crew Operating Manual or in the Flight Crew Training Manual. (See NTSB Accident Report). No mention was made of the two auto-throttle shortcomings during Boeing Simulator Training. The anomalies were not taught to flight crews, were not trained for in the simulator, and not



spoken about by the Boeing Company as training company to Asiana. This hush-up by Boeing is taken as deliberate ***suppression of vital flight safety information*** by the Boeing Company that could otherwise have prevented the fatal crash of Asiana 214.

Notwithstanding the Asiana flight crew's 'mismanagement of the airplane's descent', and failure to 'sufficiently monitor and manage their airspeed', the suppression of two known flight safety issues relating to the B777 auto-throttle system contributed to the accident of Asiana 214 ***in equal measure*** to the flight crew failures. ***Boeing's willful suppression of vital safety issues*** demonstrated an extreme indifference to human life (the safety issues being: the failure of the auto-throttle to maintain speed in the mode Asiana 214 was flying in and its failure to provide low speed protection in that mode).

#### ***Flight Safety Warnings Callously Ignored***

Prior to the accident of Asiana 214, the Boeing Company received flight safety warnings that cautioned Boeing on the potential disastrous consequences of the anomalies in the Boeing 777 auto-throttle system. The warnings came from a Federal Aviation Administration (FAA) Test Pilot, Eugene Arnold. Arnold felt that "even though the system had been certified previously and had met the requirements of Federal Aviation Regulations, it was a less-than-desirable feature and it could be improved upon". (See NTSB investigation). In response, ***Boeing callously replied that the Boeing 777 auto-throttle had been certified and had no problems in service***, and had "met the requirements for what was intended for the system". The Asiana 214 accident sadly demonstrated that the anomalies in the B777 auto-throttle *were indeed a problem* in service and the NTSB recommended in their Accident Report Summary that a certification design review be convened.

In addition, the European Aviation Safety Agency (EASA) warned Boeing that inconsistencies in flight automation had in the past been a strong contributor to aviation accidents. ***Boeing also callously disregarded the European Aviation Safety Agency's warnings***. That disregard for air safety did not stand in isolation and was not the only history of the company's extreme indifference to human life. Boeing already had 'blood on its hands' by suppressing vital flight safety warnings which had previously led to the death or injury of 166 people in the accident of Air India Flight IX-812. Boeing was further warned by Captain Anthony Keyter (a retired Senior Boeing Instructor Pilot and seasoned B777 instructor) that their lawless corporate culture would lead to more deaths in preventable aircraft accidents caused by that unimpeded lawlessness.

***Boeing callously failed to heed the warnings of the European Aviation Safety Agency; failed to heed the warnings of FAA Test Pilot Eugene Arnold; and coldly disregarded the warnings of their retired Senior Boeing Instructor Pilot. Boeing suppressed the warnings and vital information*** on the B777 auto-throttle anomalies. Boeing's cruel indifference created grave risk of death and injury to all who flew on its B777 aircraft and led directly to the death of three passengers and injury to another 181 on Asiana 214. Boeing's extreme indifference to human life violates the Revised Code of Washington, statute RCW 9A.32.30, and concerning the three passengers who perished constitutes murder in the first degree. RCW9A.32.030 states in relevant parts:

*"(1) A person is guilty of murder in the first degree when: ... (b) Under circumstances manifesting an extreme indifference to human life, he or she engages in conduct which creates a grave risk of death to any person, and thereby causes the death of a person;..."*



Boeing's lawless behavior also violated the United States Code 18USC1111 (or 18USC1112) and constitutes murder or manslaughter of three who died. Concerning the 181 injured passengers, Boeing's culpability in the accident of Asiana 214 constitutes attempted murder pursuant statute 18USC1113. (See the *Dossier of Crimes, Volume III, Chpt 42.1.5* for details).

Murder charges were filed against Boeing but remain suppressed but pending in the United States Supreme Court in the Boeing Company Mass Murder Case; and also remain suppressed by President Biden and his Cabinet, the DOJ, the FBI, the SEC, and the US Congress. Because of that concealment of crimes committed by the Boeing Company, Boeing's extreme indifference to human life continued unabated and the next two avoidable accidents and deaths were predictable and on the cards – for the very same reasons: Boeing callously ignoring safety warnings and withholding and concealing pertinent flight safety information from aircrews.

#### **4.4. MURDER RE 346 DEATHS ON BOEING 737 MAX AIRCRAFT**

The crash of *Lion Air Flight 610*, a new Boeing 737 Max 8, on 29, October 2018 in Indonesia, involved a failure in a new Boeing 737 MAX flight control system. Lion Air 610 pilots were not informed of the new control system, did not recognize the failure mode, and were not trained on emergency procedures for the malfunction of that undisclosed system that occurred on their flight. The reason was that, in a deliberate and criminally negligent decision, Boeing did not inform flight crews of that new system and did not train them for any malfunction in that system – instead favoring its commercial interests, that of cutting training costs to enhance the sale of more aircraft, in the competitive market with Airbus Industries. The direct result was the preventable death (the murder) of 189 people.

In the crash of *Ethiopian Airlines Flight 302* on 10 March 2019, the crash report indicated that the Boeing 737 Max 8 went down in a similar scenario and *for similar reasons* as Lion Air 610 shortly after take-off, killing all 157 people on board. Despite the crew following the new interim but inadequate emergency procedures (hastily disseminated after the Lion Air crash), they were overwhelmed by the physical forces on the control yoke and finally lost control of the aircraft, in the same way as with the Lion Air flight before them. Once more, considering the commercial implications, Boeing failed to take the decisive action of grounding the Boeing 737 Max aircraft until *proper fixes* were in place, despite knowing the dangers.

The 346 deaths were tragic, were avoidable, and are in large part to blame on the Boeing Company's criminal corporate culture, extreme indifference to human life, and on their conduct which created a grave risk of death and predictably, in harsh reality, resulted in death. *The Boeing Company's criminal culpability* is briefly discussed below and is described in more detail in criminal charges presented in the *Dossier of Crimes, Volume III, Chapter 42.1.8*.

##### **1. Criminally Negligent Decisions on MCAS:**

During the design and build phase of the 737 Max, Boeing understood full well that MCAS was a, quote, "safety critical system". FAA Acting Administrator at the time confirmed that assessment. Boeing design requirements and coordination sheets of 1 March 2016 and 11 June 2018, said: "MCAS should not have any objectionable

interaction with the piloting of the airplane”, and “MCAS shall not interfere with dive recovery”. Yet, Boeing willfully ignored their own design requirements and coordination sheets. The MCAS system indeed violated both these criteria, knowingly. Boeing also initially included an MCAS enunciator in the cockpit and later willfully discarded the plans in favor of commercial profits. Thus, under circumstances manifesting an extreme indifference to human life, Boeing engaged in conduct which created a grave risk of death to persons, and thereby caused the death of 189 persons on Lion Air 610 and 5 months later, the death of another 157 persons on Ethiopian Air 302.

**2. *Criminally Negligent Decisions on Angle of Attack Sensors for MCAS:***

Boeing knew that the ‘single point’ failure of a single Angle of Attack (AOA) sensor feeding the MCAS system was an obvious weak link in the design of the MCAS system. During 2015, a Boeing engineer warned that MCAS was not sufficiently redundant. In Boeing’s own internal “Airplane Level Safety Assessment”, paper AVN-16, Boeing declared: ‘loss of one AOA (Angle of Attack Indicator) followed by an erroneous AOA (on the other side) is deemed potentially catastrophic before crew recognition of the issue’. Boeing willfully ignored these assessments in favor of *cost considerations*.

Furthermore, Boeing knew that the ‘AOA Disagree’ light in the cockpit did not work unless airlines bought an upgraded package. Boeing failed to inform crews and the FAA of this issue. It is self-evident that (a) The decision made by Boeing to use a single angle of attack indicator for the augmentation system, instead of the two available, renders Boeing criminally negligent and culpable; (b) Boeing knowingly and willfully cut corners on safety in favor of commercial profits, rendering the company criminally negligent and culpable. Again: under circumstances manifesting an extreme indifference to human life, Boeing engaged in conduct which created a grave risk of death to persons, and thereby (ultimately) caused the death of 346 persons on Lion Air 610 and Ethiopian Air 302.

**3. *Deliberate Concealment of Pertinent Technical Information:***

In the first version of the flight manual, pilots were to be informed of MCAS, although that logical decision was later reversed to the detriment of safety. On 30 March 2016, Boeing requested the FAA for permission to remove all reference to the MCAS from the manuals since it was ‘way outside of the normal operating envelope’. Boeing deliberately left a description of the Maneuvering Characteristics Augmentation System out of the technical, training, operations manuals, and non-normal checklists for pilots, so as to cut down the time and cost of ‘differences training’ between different models of Boeing 737 aircraft – and to avoid simulator training. Deliberate concealment of technical information and misleading of FAA certification inspectors prevented emergency procedures to be formulated and trained for. Boeing’s deliberate failure to inform pilots of the important new system was done for commercial profit enhancement reasons – to be competitive in the marketplace with Airbus so as to sell more aircraft – and that proved fatal. Boeing bears criminal culpability for that concealment under Washington State law and the United States Code.



**4. *Criminally Negligent Decisions on Training of Pilots:***

Boeing knew that crew simulator training would enhance crew recognition and action on potential MCAS/AOA failures. However, not only did Boeing not inform pilots of the system, Boeing deliberately did not train flight crews on how to recognize and how to deal with a failure mode in the MCAS. Boeing understood how important crew training would be to prevent crashes, but actively worked against training of crews. Boeing pressured the FAA and regulators around the world to *not require* simulator training. According to Boeing 737 Chief Technical Pilot, Forkner, he “*mind-tricked*” the FAA, and by inference foreign regulators, into accepting that no simulator training was required for 737 Max pilots.

That decision was motivated by commercial considerations concerning profit. Training of pilots whatsoever on a new type or model, and training time and costs, features heavily in the sales promotion of a new aircraft. Boeing deliberately (and criminally), under circumstances of extreme indifference to human life, “*mind-tricked*” the regulators to avoid simulator training as a feature of its sale of the new B737 Max aircraft. Boeing marketed the Max 8 in part by telling customers that pilots would not need additional simulator training beyond that required for older models of B737. That lack of knowledge and training on the augmentation system proved to be a major cause of loss of control of the aircraft which ultimately proved to be fatal to 346 people on Lion Air 610 and Ethiopian Airlines Flight 302. Boeing bears criminal culpability for the deaths under Washington State law, RCW 9A.08.030(1)(b) where Boeing Commercial Airplanes is headquartered.

5. ***Conduct which Created a Risk of Death:*** With these seemingly innocuous (but as it turned out, ‘perilous’) decisions made by the plane maker, as presented above – and made in favor of its commercial considerations to better sell the new aircraft - Boeing engaged in conduct which created a grave risk of death to passengers and crew.
6. ***Extreme Indifference to Human Life:*** Boeing’s conduct - of (a) designing an important flight system without redundancy in a failure situation; (b) deliberately failing to inform the pilots of the new flight control system (MCAS); and (c) deliberately failing to train pilots for failure modes of that system, created grave risk of death and showed an extreme indifference to human life.
7. ***Conduct led to Death:*** The grave risk posed by Boeing’s aforementioned conduct, materialized in the circumstances on board Lion Air 610 and later on Ethiopian Air 302. The failure mode of the flight control system (MCAS), together with the pilot’s lack of knowledge of the existence of such a system, and their lack of training for a potential malfunction of such a system, caused the crash of flight 610 which culminated in the death of 189 people on Lion Air 610. Similar circumstances, and inadequate emergency measures, caused the death of 157 on board Ethiopian Air 302.
8. ***The Revised Code of Washington State:*** Statute RCW9A.32.030, states in relevant parts: “(1) A person is guilty of murder in the first degree when: ... (b) Under circumstances manifesting an extreme indifference to human life, he or she engages in conduct which creates a grave risk of death to any person, and thereby causes the death of a person...”



**9. Murder in the First Degree:** The Boeing 'Perpetrators' manifested an extreme indifference to human life, and engaged in conduct which created a grave risk of death to passengers and crew, and thereby caused the death of 346 people. The Boeing Perpetrators, and all those who enabled them (co-conspirators), are guilty of murder in the first degree in the death of the 189 who died on Lion Air 610 and later, the death of 157 on board Ethiopian Air 302.

Boeing's criminal actions described above; their repression of safety issues, safety warnings, and pertinent safety information in favor of its commercial interests, form part of a ***systematic pattern of criminal conduct***. The history of that '*systematic pattern of criminal conduct*' harkens back to the crash of Air India IX-812 and Asiana 214, and manifested again in the crashes of Lion Air 610 and Ethiopian Air 302. In all, 507 people have died because of Boeing's criminal conduct and 189 have been gravely injured. The deaths fall into the category of '*crimes against humanity of mass murder, in terms of the Rome Statute of the international Criminal Court*'.

That '*systematic pattern of criminal conduct*' (or differently put, Boeing's ***criminal corporate culture***), together with Boeing's indifference to human life, is ongoing and creates a continuing grave risk to human life and to the well-being of all who fly on Boeing aircraft.

Because the US Government, the DOJ, the FBI, the Presidency, the Congress, and the US Supreme Court ***did not investigate, did not prosecute, did not administer the laws upon Boeing perpetrators, and did not terminate*** the Boeing Company's criminal behavior, that criminality has continued unabated, as the following sections will prove.

#### **4.5. US GOVERNMENT ACCOMPLICES / ACCESSORIES IN MASS MURDER**

##### ***US Government Accomplices***

There are many *US Government accomplices* who created the circumstances, offered the opportunity, furthered the commission of, perpetuated the concealment of the safety warnings and who prevented remedial actions; and who enabled the perpetrators and made it possible for them to commit mass murder. Accomplices were informed through a series of letters of the criminality within the Boeing Company, perpetrated in concert with and under the protection of the US Government. Accomplices were warned of the dangers to the flying public and were requested to take action to mitigate that danger. Accomplices had the ability, the authority, and the legal and moral duty to (a) address the attempts to assassinate the witness Anthony Keyter; (b) to address the concomitant suppression of vital flight safety warnings concerning the international community; (c) to address the ensuing murders; and (d) to bring the Boeing perpetrators to justice.

US Government *accomplices* chose instead to protect the Boeing perpetrators from prosecution and to provide them safe haven and passage. They were motivated by commercial expediency, or political expediency, or whatever reasons of their own. They thereby facilitated the prolonged suppression of crucial flight safety warnings and vital technical information pertinent to flight safety. They unlawfully furthered the commission of crimes by the Boeing perpetrators, enabled them to commit further crimes, and made it possible for them to perpetrate crimes against humanity. *Evidence* of their knowledge, their inaction where action was due, and their assisting the perpetrators to escape justice, will be supplied in the form of a long series of letters, reports, flight safety warnings, and requests dispatched to US Government accomplices.



***US Government Accessories after the Fact***

*US Government accessories after the fact* were informed that a systematic pattern of criminality within Boeing gave rise to an identifiable and definite *corporate culture of extreme indifference to human life*. They were informed that Boeing's criminal culpability in the four air accidents constitutes murder in the first degree in the death of 507 people and attempted murder of 189 others who were gravely injured. *US Government accessories* nevertheless assisted the mass murderers from the Boeing Company to escape justice while knowing that mass murder had been committed in the international arena. *US Government accessories*, knowing that offenses against the United States had been committed, received, relieved, comforted or assisted the offenders in order to hinder or prevent his apprehension, trial or punishment, and are rendered accessories after the fact to the Boeing Company murders

**5. ONGOING BOEING / US GOVERNMENT  
CRIMINAL CONSPIRACY**

***Overview***

The Boeing Company has a long history of criminal conduct. Likewise has the US Government gained a sizeable history of willfully and unlawfully protecting the Boeing Company from prosecution. This has been true of the Boeing Company's culpability in crimes against humanity of mass murder, in obstruction of justice, in subversive crimes, as well as Boeing's crimes of substantial fraud upon international investors.

The Boeing Company trades its shares on the New York Stock Exchange (NYSE), the NASDAQ Stock Market, and the London Stock Exchange (LSE). The Boeing Company is presently committing massive fraud upon the international investing public and financial markets. Boeing is doing that in two ways: (a) by their failure to report past crimes, as demanded by the Securities Act. Some of those crimes are listed in the previous sections of this complaint. And (b) by unlawfully building commercial airplanes and doing business in Washington State, where the company is, by law, absolutely prohibited from doing any business there.

The United States Government, being fully informed of the ongoing Boeing Company fraud, is turning a blind eye to that criminal activity, despite a duty to address and terminate it. Boeing and the present United States Administration are working in concert to defraud the world's investors and financial markets of hundreds of billions of US dollars. Their combined criminality will potentially have a major detrimental effect upon financial markets globally, which will destabilize of the world's financial system. The massive fraud is likely to bring sudden financial loss of hundreds of billions to stock exchanges and great financial suffering to an untold number of ordinary people globally. (*See the Dossier of Crimes, Vol. III, Chapter 42.1.16b - \$1.42 Trillion Stock Exchange Fraud*).

The United States Government unofficially and unlawfully *exempts the Boeing Company* from the legal demands of the Securities Exchange Act, specifically, the demand to notify shareholders or prospective shareholders of material information (past, present, and future) that will affect its share price. The amount of that fraud, perpetrated upon shareholders and prospective shareholders by Boeing acting in concert with the US Government, is a staggering **\$249.88 billion** (Boeing's part of the \$1.42 trillion fraud figure). That fraud is perpetrated with the knowledge and under the protection of US Government institutions like



the corrupted institutions of the Presidency, the DOJ, the FBI, the Congress, the US Securities Exchange Commission (SEC), and a corrupted US Supreme Court.

Where the Boeing Company has '*supposedly been fined*' by the United States Government (by the DOJ and SEC) for its wrongdoing, the government in fact allows the Boeing Company to penalize its *shareholders* for Boeing's 'criminal corporate culture' and for any crimes committed by the Boeing Board of Directors, Executive Council, and lesser officials. This practice represents a deceptive legal principle: it blames and punishes innocent shareholders for the criminal conduct of the Boeing Board and Executive Council and lesser officials.

Examples of this criminal deception by Boeing *and* the US Government are witnessed in the recent fines upon the Boeing Company by the US Department of Justice (DOJ) and Securities and Exchange Commission (SEC): fines of \$2.5 billion and \$200 million respectively. These fines were borne by *Boeing shareholders*, while, in the deceptive words of the DOJ prosecutor: "*This resolution [a delayed prosecution agreement] holds Boeing [shareholders] accountable for its employees criminal misconduct*" – *while those criminal employees go scot-free.*

Boeing has kept up an ongoing and unbroken series of violations of the United States Code, the Revised Code of Washington, the Securities Act, the Department of Justice 'Deferred Prosecution Agreement' and now the 'Boeing Plea Agreement', and a Court Order issued by the US District Court for Northern Texas. The ongoing violations have not been addressed but have instead been swept under the carpet by the US Government agencies involved – therefore sanctioning or approving the Boeing Company violations of laws, agreements, and court orders; and assisting the criminals to escape justice.

The government's actions, fining one infraction but not the next or the next, or the next, demonstrates the totally arbitrary nature of American justice. The laws are applied if and when it suits the government to make a political statement - and is *not applied* when that is expedient to the government. Such an arbitrary justice system makes a mockery of law-enforcement, of the courts, and of American jurisprudence, while leaving the man in the street to suffer the consequences of Boeing's violations, as is demonstrated in this Complaint.

#### ***Deferred Prosecution Agreement***

On January 7, 2021, the Department of Justice (DOJ) issued Boeing with a '*Deferred Prosecution Agreement*' (DPA), which agreement debarred it from engaging in further crimes. Since the day on which that agreement was entered the Boeing Company had been engaged in an ongoing series of criminal offenses, in complete disregard to the Deferred Prosecution Agreement. Some of those crimes are detailed here and others are listed and referenced as to where those details may be obtained. Having been made fully aware of those breaches by Boeing from the start, the DOJ chose to do nothing but to provide Boeing with safe haven and passage – until the very end of the three years that the DPA was in place. Then the DOJ addressed one count of fraud only, and willfully left the more serious crimes out of the picture.

#### ***Court Order of the US District Court, Northern Texas***

On January 26, 2023, the US District Court for Northern Texas ordered the Boeing Company to desist from engaging in (further) criminal violations. The order was issued in criminal case number 4:21-CR-5. However, since the date of the court order, the Boeing Company



has been fully engaged in its normal and ongoing criminal violations of law on a daily basis and with malice aforethought, despite of the order and in breach of that order.

Without the US Government and/or the courts having the will to enforce the laws, enforce the DPA or Plea Agreement, and enforce the US District Court Order, the Boeing Company enjoys impunity against prosecution, with the knowledge, consent, and culpability of the elements of the US Government mentioned: the Presidency, the DOJ, the FBI, the Congress, the US Supreme Court and potentially lower courts, and the Securities and Exchange Commission.

The ongoing Boeing criminal violations and conspiracy with the US Government, to defraud the United States and international financial markets and investors, are detailed in this Section of the Complaint.

### **5.1. ONGOING VIOLATION OF SECURITIES ACT, SECTIONS 17(A)(2) AND 17(A)(3)**

The Boeing Company is presently in violation of Sections 17(a)(2) and 17(a)(3) of the Securities Act, for failing to report material facts to its shareholders and prospective shareholders that will significantly and negatively impact Boeing's share value. Those material facts relate to a series of crimes committed by Boeing and its Board of Directors and Executives, which have yet to be addressed and prosecuted. Boeing and its Board of Directors and Executives have played a leading role in a broader and virulent criminal conspiracy involving the following crimes:

*Fraud on a large scale; obstruction of justice, 18USC1519; theft of court record; tampering with a witness; retaliation against a witness; contempt of court; perjury; conspiracy to commit offenses; conspiracy to kidnap; conspiracy to murder; conspiracy against rights; deprivation of rights; misprision of felony; treason; misprision of treason; seditious conspiracy; insurrection against the laws; accessory after the fact to offenses of their government co-conspirators as detailed in the 'Dossier of Crimes'; crimes against humanity of mass murder in the death of 507 people; crimes against humanity of other inhumane acts in the grave injury of 189 innocent civilians.*

These Boeing Company crimes are meticulously detailed over a number of years in the 2,400-page tome titled the '**Dossier of Crimes**', **USA, Volume III, Chapter 42**. The dossier is scripted by the prosecutor qui tam Anthony Keyter, and filed with multiple USA authorities. The crimes and criminal charges have, however, been covered up by those authorities. The crimes and their cover-up have been perpetrated with the full knowledge and tacit consent of United States President Biden and corrupt elements of the US Government and the Washington State Government. The crimes have not been investigated or prosecuted and remain filed with President Biden and the DOJ. Again: Boeing is illegally 'protected by corrupt elements of the US Government', against prosecution for its lawlessness.

The Boeing Company has willfully failed to advise its investors and future investors that criminal charges are pending against the company and against the Board of Directors, as is legally required of them pursuant Sections 17(a)(2) and 17(a)(3) of the US Securities Act. The Boeing Company has deliberately failed to advise its shareholders and prospective shareholders that its Board of Directors and multiple other officials could be arrested at any moment (bar for the illegal protection and impunity granted by certain corrupt government



officials). The Boeing Board of Directors willfully failed to advise its investors (and traders in its shares) of *all material facts* that impact, or potentially impacts, its share price. That deliberate failure to report constitutes *ongoing fraud upon its investors* in the amount of \$249.88 billion and violates Sections 17(a)(2) and 17(a)(3) of the US Securities Act.

The United States Government (the President and Cabinet, the Attorney General and senior DOJ Officials, the Director of the FBI and senior officials, the Congress, the SEC, and the US Supreme Court) is fully informed of the \$249.88 billion Boeing stock exchange fraud. The US Government has a duty to terminate that fraud and to prosecute the Boeing Company for all offenses against the United States. The US Government, ***acting in criminal conspiracy with Boeing***, has deliberately failed to perform its duties of investigation and prosecution of known crimes, and of terminating those crimes. The fraud upon the public and violation of Sections 17(a)(2) and 17(a)(3) of the Securities Act thus remains ongoing and constitutes state-supported tyranny upon the populace. The financial risks to the investing public, remains great.

## ***5.2. ONGOING VIOLATION OF REVISED CODE OF WASHINGTON, RCW 9A.28.40***

The Boeing Company is fraudulently operating where it is legally debarred from doing business. The Boeing Company and the Boeing Board of Directors and Executives have played a leading role in a criminal conspiracy relating to the Boeing 737 MAX accidents and two further air accidents involving the death (mass murder) and/or injury (attempted murder) of 696 people.

The US Congressional Committee investigating the MAX accidents confirmed that, quote: *"Boeing had a criminal conspiracy"* which precipitated the 737 MAX accidents. The DOJ found that Boeing conspired to defraud the United States. In July 2024 Boeing itself admitted in its Plea Agreement that the company conspired to defraud the United States. The Prosecutor Qui Tam, Anthony Keyter, also has significant evidence of *'criminal conspiracy to kidnap and murder'* by Boeing and President Bush, perpetrated within Washington State, USA. (See the *'Dossier of Crimes', Volume III, in Chapter 1 and Chapters 41 – 44*). Boeing engaged in criminal conspiracy.

A major division of the Boeing Company, namely *Boeing Commercial Airplanes*, is located in Washington State. Washington State law forbids any company that has taken part in a *criminal conspiracy*, to do business in that state. The Revised Code of Washington (RCW) clearly states in statute RCW 9A.08.030(5), quote:

*"Every corporation, whether foreign or domestic, which shall violate any provision of RCW 9A.28.40, shall forfeit every right and franchise to do business in this state". [RCW 9A.28.40, refers to criminal conspiracy].*

The Boeing Company has perpetrated (and is still presently perpetrating) multiple counts of criminal conspiracy. The Boeing Company is thus debarred from doing business in Washington State. Yet, the Boeing Company and Boeing Commercial Airplanes (division) continue to do business there illegally, in flagrant violation of the law and the 26 January 2023 order by the US District Court (USDC) for Northern Texas. Boeing continues to unlawfully build and sell aircraft, offer shares, pay salaries, do business with vendors, and so forth, in Washington State. And with every aircraft sold and every share offered or sold, or



salary paid, they are in violation of the criminal statute RCW 9A.28.40, the 26<sup>th</sup> January 2023 order by the USDC for Northern Texas, and their Plea Agreement of July 24 2024.

The Boeing Company has willfully failed to advise its shareholders and prospective shareholders that it is illegally doing business in Washington State, and that the unambiguous law requires it to forthwith close down its commercial airplane division in that State. Boeing's criminality and that of its directors *will undeniably devastate* its share price when these facts become public knowledge, as inevitably it must. These undisclosed and hidden facts, materially and potentially affecting the Boeing share price and the company's very existence, constitutes unmistakable ***fraud committed*** with every Boeing share that is offered and traded. The quantum of the fraud in respect of Boeing shares is equal to the value of sudden investment loss or the peak market capitalization value of the company over the period of the fraud. *That market capitalization, and thus the ongoing fraud, amounts to an astronomical \$249.88 billion (peak value on 21 December 2022).*

This fraud is perpetrated day after day with impunity. The ongoing fraud, withholding the information from investment markets that Boeing is illegally doing business in Washington State, is in direct violation of the Washington State law, the Securities Act, the Plea Agreement, and the USDC Order.

That fraud is described in detail in the ***Dossier of Crimes, USA, Volume III, Chapter 42.1.9 to 42.1.12 and 42.1.16.*** The charges are filed with President Biden and Cabinet, the SEC, and the DOJ and FBI, and the US Supreme Court, all of whom have taken no action to terminate the fraud, so as to protect the Boeing Company from prosecution. They have conspired with the Boeing Company and conspired amongst themselves to provide impunity to the Boeing Company, in violation of RCW 9A.28.40.

### **5.3. ONGOING VIOLATION OF SEC 'CEASE-AND-DESIST' ORDER**

The Securities and Exchange Commission order of September 22, 2022, ordered the Boeing Company to cease and desist from further violations of Sections 17(a)(2) and 17(a)(3) of the Securities Act. Boeing paid no heed to the cease and desist order not to commit further crimes. On a continuous basis since the SEC cease-and-desist order was issued, Boeing has been in ongoing criminal violation, on multiple counts, of the SEC order. (*See the Boeing Company's \$249.88 billion fraud as part of the \$1.42 trillion international stock exchange fraud case detailed in the **Dossier of Crimes, Volume III, Chapter 42.1.16.***)

The United States Government (the President and Cabinet, the Attorney General and senior DOJ Officials, the Director of the FBI and senior officials, the Congress, the SEC, and the US Supreme Court) has been kept fully informed of Boeing's violations of the SEC order. The US Government and the institutions mentioned have a duty to terminate that criminal violation and to prosecute the Boeing Company for all offenses against the United States. The US Government, ***acting in criminal conspiracy with Boeing***, has deliberately failed to perform its duties of investigation and prosecution of known crimes, and of terminating those crimes. The violation of the SEC order and fraud upon the public thus remains ongoing and constitutes state-supported tyranny upon the populace.



#### **5.4. ONGOING VIOLATION OF DOJ 'PLEA AGREEMENT'**

In the Boeing Plea Agreement of July 24, 2024, Boeing agreed to abide by all terms and obligations, including, but not limited to: *commit no further crimes* (paragraph 7d); *be truthful with the Court at all times* (para 7e). From the outset of the Agreement, on day one and onwards, Boeing has knowingly been in violation of both of these terms and obligations and thus in violation of the Plea Agreement. Boeing has committed ongoing crimes in violation of para 7d, as is discussed in this Section 5 of this Criminal Complaint regarding ongoing crimes.

In violation of para 7e of the Plea Agreement, Boeing has also not been truthful with this Court by withholding information which it is required by law to provide to the Court. It is required by law (statute 18USC4) to make known to the judge its knowledge of Boeing's kidnap and murder attempts upon a Boeing whistleblower/court witness (Anthony Keyter). The plot remains active to this day. Despite its obligations under law and Plea Agreement, Boeing has not been truthful with this Court and has concealed its knowledge of the commission of that offense (attempted kidnap and murder) by Boeing personnel.

The US Government, *acting in criminal conspiracy with Boeing*, has deliberately failed to perform its duties of investigation and prosecution of those known crimes, and of terminating those crimes, because of the involvement of certain high government officials in the attempts. The US Government thus remains a criminal co-conspirator to Boeing Company violations.

#### **5.5. ONGOING VIOLATION OF COURT ORDER OF USDC FOR NORTHERN TEXAS**

The court order of the US District Court for Northern Texas, promulgated on January 26, 2023 in criminal case number 4:21-CR-5, ordered the Boeing Company to desist from engaging in criminal violations. As can be seen in this Section 5 of the Complaint, the Boeing Company has been fully engaged in its normal and ongoing criminal violations of law on a daily basis and with malice aforethought, in breach of that order. The reason is that the Boeing Company mostly enjoys impunity against prosecution, that impunity being provided by: the Presidency, the DOJ, the FBI, the Congress, the US Supreme Court, the Securities and Exchange Commission, and (perhaps) the lower courts as well.

There is only one thing that will terminate Boeing's ongoing breaches of law and that is the arrest of the Boeing Directors and Executive Council Members. Without the US Government and/or the courts having the will to enforce the laws, Boeing's lawlessness will continue uninterrupted, as it has done for the past 18 years, as meticulously documented in the Dossier of Crimes, Volume III, Chapter 42.1

#### **5.6. ONGOING BOEING CRIMINAL CONSPIRACY WITH STOCK EXCHANGES**

The Boeing Company is in ongoing criminal conspiracy with the three stock exchanges it is listed on, to suppress all knowledge of its fraud upon its shareholders, as described above. Again, those stock exchanges are: the New York Stock Exchange (NYSE), the NASDAQ, and the London Stock Exchange (LSE). Once knowing that Boeing had committed the serious crime of fraud which needed a 'cautionary statement' to be issued to the markets, and knowing that the delinquent company had not issued those 'cautionaries' and was thus defrauding the markets, the three stock exchanges, NYSE, NASDAQ, and LSE had an



unequivocal duty to suspend the Boeing share-trading until a 'cautionary statement' had been issued; or to delist the company.

The three stock exchanges willfully failed to do that. Instead, they provided Boeing safe haven and passage within which to continue their fraud against Boeing international investors. The stock exchanges covered up the crimes and placed an enormous business risk upon unsuspecting Boeing shareholders. The stock exchanges themselves thus became co-conspirators with Boeing in the ongoing fraud upon the international financial / investment markets. Every tranche of Boeing shares sold fraudulently on the stock exchanges is a new count of fraud committed by the criminal conspiracy between Boeing and the three stock exchanges. At any time, when the underlying crimes of Boeing are exposed and prosecuted by the authorities (nationally or internationally), investors and prospective investors face very large losses from that *ongoing fraud*. (See the *Dossier of Crimes, Volume III, Chapter 42.1.16*).

The criminal conspiracy between Boeing and the three stock exchanges and the resultant fraud upon the unsuspecting investment markets of some \$249.88 billion is in direct violation of the United States Code on fraud, the Securities Act, the USDC Order, and the Boeing Plea Agreement.

Once again the United States Government was kept fully informed of Boeing's violations. Once again, the US Government has a duty to terminate the criminal violations and to prosecute the Boeing Company for all offenses against the United States. The US Government, *acting in criminal conspiracy with Boeing*, deliberately failed to perform its duties of investigation and prosecution of known crimes, and of terminating those crimes. In the matter of fraud by Boeing acting in concert with the stock exchanges, the US Government remains a criminal co-conspirator to those violations.

#### **5.7. ONGOING BOEING CRIMINAL CONSPIRACY WITH THE US GOVERNMENT**

As has been shown above, the Boeing Company is presently engaged in an ongoing criminal conspiracy with US Government institutions and officials:

- (a) To cover up a long running criminal endeavor which involves:

*Crimes against humanity of mass murder and grave injury; Crimes against the administration of justice, like obstruction of justice; Subversive crimes, for example insurrection against the laws of the United States as defined by 18USC2383; and Seditious conspiracy as defined by statute 18USC2384. (See the Dossier of Crimes, Volume III, Chapter 42.1.11.*

- (b) To cover up the fraud on the three stock exchanges in the amount of \$249.88 billion.

The ongoing criminal conspiracy between Boeing and the United States Government, to cover-up the ongoing fraud and unaddressed past crimes like mass murder and attempted murder, is in direct violation of the United States Code, the Securities Act, the USDC Order, the Rome Statute of the International Criminal Court, and the Boeing Plea Agreement. These violations include the United States Government as co-conspirator therein, in violation of statute 18USC371.

### **5.8. ONGOING BOEING CRIMINAL CONSPIRACY WITH ALASKA AIRLINES**

The Boeing Company and Alaska Airlines have both individually and together engaged in criminal conspiracy to commit offenses of witness tampering in the ‘Boeing Company Mass Murder Case’. Pursuant the Revised Code of Washington State, RCW 9A.08.030(5), neither of these companies is eligible to do business in that state, let alone with each other. Yet they have recently concluded a 52 new aircraft deal and continue month in and month out to consummate that deal, in direct violation of RCW 9A.08.030(5), which states: “*Every corporation, whether foreign or domestic, which shall violate any provision of RCW 9A.28.40, shall forfeit every right and franchise to do business in this state*”. [RCW 9A.28.40, refers to criminal conspiracy]. (See the Dossier of Crimes, Volume III, Chapters 42.3.1).

The ongoing criminal conspiracy between Boeing and Alaska Airlines to illegally do business together in Washington State, where they have both legally forfeited that right, is in direct violation of the United States Code on fraud, the Revised Code of Washington RCW 9A.08.030(5), the Securities Act, the Order of the USDC for Northern Texas, and the Boeing Plea Agreement.

The United States Government has been kept fully informed of the violations by these two corporations, have condoned their criminal violations, have provided safe haven and passage to Boeing and Alaska Air, have assisted them to escape justice, and have rendered the United States Government complicit in those violations.

### **5.9. ONGOING BOEING CRIMINAL CONSPIRACY TO DEFRAUD THE US**

Regarding the Boeing 737 MAX accidents, DOJ prosecutors found that Boeing knowingly and willfully conspired to defraud the United States by undermining the FAA’s ability to evaluate the safety of the plane. In January 2021 Boeing was fined \$2.5 billion by the DOJ for one count of conspiracy. Assistant Attorney General David Burns said: “*Boeing Employees chose the path of profit over candor by concealing material information from the FAA concerning the operation of its 737 MAX airplane and engaging in an effort to cover up their deception*”.

Despite that heavy fine, Boeing today continues to defraud the United States, the Securities and Exchange Commission, Boeing shareholders, the Washington State Government, and the DOJ with whom they have a Plea Agreement – as shown in the paragraphs above. Boeing’s current and ongoing crimes, described above and perpetrated in conjunction with others, similarly choose a path of profit over candor and ***conceal material information*** which ought by law, by Plea Agreement, and the USDC order, to be disclosed to the DOJ, the SEC, and to the USDC for Northern Texas. Their failure to disclose material information to these government institutions *constitutes an ongoing conspiracy to defraud the United States*.

That conspiracy by Boeing, ***to conceal material information***, is joined in by the United States Government, who is similarly concealing that very same information pertinent to Boeing shareholders, prospective shareholders, and the SEC.

### **5.10. BOEING’S ONGOING CRIMINAL CORPORATE CULTURE**

The existing Boeing criminal corporate culture has been demonstrated through many examples. The prosecutor qui tam, Anthony Keyter, has experienced and observed this



criminal corporate culture over the past 18 years and provides some pertinent examples to illustrate that criminal proclivity. The incidences may have come and gone, but the present Boeing Board of Directors and Executive Council are today still actively engaged in the cover up of the past criminal offenses and are committing the same crimes as '*accessories after the fact*' for preventing hindering, and delaying the apprehension, trial, and punishment of the perpetrators in their midst. The present Boeing Board of Directors and Executive Council are today showing the same extreme indifference to human life as did their predecessors.

#### ***Boeing Company Mass Murder Case***

The so-called '*Boeing Company Mass Murder Case*' documents the avoidable death (murder) and injury (attempted murder) of 696 people in four separate air crashes. They are the preventable air accidents of Lion Air Flight 610, Ethiopian Airlines Flight 302; Asiana Flight 214, and Air India Flight IX-812, described above in this Complaint in Section 4. ***Before each one of those accidents***, Anthony Keyter, as Senior Instructor Pilot (retired) and consummate aviation professional, ***warned*** the Boeing Company of the dangers of their *modus operandi* – warnings which were spurned, but if they were heeded, would have prevented the next and the next accidents. That flight safety warning remains as applicable today as it was the first time it was expressed. Boeing's criminal corporate culture is demonstrated through the four avoidable accidents; and one incident of retaliation (attempted murder) against the prime witness, Anthony Keyter. (See the ***Dossier of Crimes, Volume III, Chapter 42.1.8***, the Consolidated Boeing Company Mass Murder Case.

In each of the four air accidents, Boeing withheld pertinent flight safety information in favour of commercial considerations and enhanced profitability. (This proclivity towards deceit and dishonesty by Boeing is known through the statement by US Attorney Erin Cox, as follows: "*the misleading statements, half-truths, and omissions communicated by Boeing employees to the FAA impeded the government's ability to ensure the safety of the flying public*"). That proclivity by Boeing towards deceit and dishonesty is ongoing and continues to put flight safety on its aircraft at risk.

The ongoing criminal conspiracy between Boeing and corrupt elements of the US Government to cover up the '*Boeing Company Mass Murder Case*', and to withhold information of its existence from the investment markets, is in direct violation of the United States Code, the Securities Act, the USDC for Northern Texas Order, the Rome Statute of the International Criminal Court, and Boeing's Plea Agreement.

#### ***The Ongoing Trap set for Kidnap and Murder of a Court Witness / Boeing Whistleblower***

There is a current trap set by Boeing and by certain US Government officers acting in concert with Boeing, to kidnap and murder a prime Supreme Court witness to Boeing's crimes (that is, Anthony Keyter, a retired Boeing Company Senior Instructor Pilot and the prosecutor *qui tam* in this matter). As of the time of writing, retaliation by Boeing, and the trap set by Boeing and corrupt US Government officials for the kidnap and murder of the witness/whistleblower, has been confirmed by the Federal Aviation Administration (FAA) to be ***active and ongoing*** to this day. The evidence of that *continuing crime* is available to serious investigators. Prima facie evidence is contained in the '***Dossier of Crimes, Volume III, Chapter 42.1*** - or can be obtained directly from the FAA.

There can be no clearer an example of a thoroughly criminal corporate culture in Boeing, and extreme indifference to human life, than this ongoing '*Jamal Khashoggi style*' ***kidnap and***



***murder plot*** by Boeing of one of its own trusted senior employees. These four avoidable air accidents and one incident point to the Boeing Company's extreme indifference to human life and a criminal corporate culture. The kidnap and murder attempts were made at the behest of and on behalf of President GW Bush (and Air India). The payback to the Boeing Company, the commercial incentive for the foiled murder attempt upon one of their own, is believed to be the US Air Force Tanker Aircraft contract (modifying the Boeing 767) which problematic transaction was being decided between January 2007 and February 2011.

In each of the examples presented above, the Boeing Company enjoys impunity from prosecution for its criminal corporate culture - such safe haven and passage enabling more crime by the company in the future.

***Boeing 'Criminal Corporate Culture'***

The Boeing Company's corporate culture is one of indifference to the law. This aspect is demonstrated by the sheer number of (unaddressed) criminal complaints filed against the company and by the ongoing breaches detailed in this Complaint. The multiple breaches of the United States Code, of the Plea Agreement, and of the US District Court order, is proof that Boeing's corporate culture is a lawless culture. Lawlessness is an entrenched business philosophy and *modus operandi* for the company. Such flagrant violation of law makes a mockery of American jurisprudence. This systemic lawlessness will not change unless the US Government and the courts take decisive action against the leadership of the Boeing Company, in order to enforce a more law-abiding corporate culture.

History has shown that the criminal culture by Boeing's leaders will not change with a mere fine, no matter how big such fine is. The Department of Justice fine after the Max accidents, of \$2.5 billion on January 7, 2021, changed nothing in their criminal corporate culture. The subsequent Securities and Exchange fine of \$200 million on September 22, 2022, changed nothing in their *modus operandi*.

In addition, the Boeing Company, through its leaders, shows an extreme indifference to human life. The Directors and Executives of the Boeing Company have engaged and continue to engage in conduct which creates a grave risk of death to people. That conduct has already caused the death of 507 people and grave injury to another 189 worldwide - despite flight safety warnings on the consequences of their actions.

This Criminal Complaint has endeavored to show that Boeing and its leaders have on many occasions and in various ways violated the laws and orders demanding Boeing desist from doing further crime. The prosecutor *qui tam*, Anthony Keyter, is of the belief that only the arrest and incarceration of the Board of Directors and certain Executives, for violation of the criminal statutes, will serve to terminate those violations, and will change for the better the entrenched criminal corporate culture in the Boeing Company.

***US Government 'Criminal Corporate Culture'***

Exacerbating and multiplying the dangers and risks to the public, is a US Government with leadership and institutions that are protecting the Boeing Company from prosecution for past and continuing crimes. Those institutions and officials being: the Presidency and Cabinet, the Attorney General and the DOJ, the Director and senior officials of the FBI, Congress, the SEC, and the US Supreme Court and certain lower courts, have full knowledge of the crimes, have provided Boeing with safe haven and passage, and are culpable as accomplices and/or accessories to the Boeing criminal spree.



Jointly, they have made it possible for others to commit crimes against the state by failing to enforce, administer, and execute the laws. By their inaction, where action was due, they have sanctioned the continuation of the entire criminal endeavor.

## 6. INSURRECTION AGAINST THE LAWS

There is within our nation today, a virulent and dangerous insurrection afoot against the laws of the United States. This subversive activity has the objective of preventing, hindering, and delaying, by force on occasion, the faithful execution of the laws of the United States, contrary to the authority thereof. This potent conspiracy against the nation, against society, and against the American people, is contrary to the laws and to the principles of individual rights, freedom, and justice, enshrined in the United States Constitution. The insurrection against the laws is also contrary to the ideals of the founding fathers of this nation who envisaged a benign government *by the people*, and more importantly *for the people*.

The Boeing / US Government Perpetrators in this Complaint have subversively conspired with one another against the nation and the American people, to defeat the laws of the United States. They have seditiously plotted the use of force to prevent, hinder, and delay the execution of the laws. Their combined willful disobedience to the laws of the United States, and their perpetration of numerous crimes against the United States, renders their criminal acts a potent insurrection against the authority of the United States, and against the laws thereof. The statutes on subversive activities prohibit such civil disobedience. The combined subversive activities against the laws violate the United States Code 18USC2383:

***Rebellion or Insurrection - 18USC2383:*** *Whoever incites, sets on foot, assists, or engages in any rebellion or insurrection against the authority of the United States or the laws thereof, or gives aid or comfort thereto, shall be fined under this title or imprisoned not more than ten years, or both; and shall be incapable of holding any office under the United States.*

## 7. TREASON UPON THE NATION

United States Code addressing treason against the nation, statute 18USC2381, unambiguously states:

***Statute 18USC2381 on Treason:*** *Whoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States or elsewhere, is guilty of treason and shall suffer death, or shall be imprisoned not less than five years and fined under this title but not less than \$10,000; and shall be incapable of holding any office under the United States. [Note: enemies foreign or domestic, like the insurgents]*

The Perpetrators, all owing allegiance to the United States, have adhered to their (domestic) enemies - the insurrectionists - giving them aid and comfort within the United States, by assisting the insurrectionists to escape justice and enabling them to continue their insurrection against the laws.

Pursuant statute 18USC2381, the Perpetrators' in this Complaint shall suffer death, or shall be imprisoned not less than five years and fined under this title but not less than \$10,000; and shall be incapable of holding any office under the United States. Yet the Government Perpetrators hold office as if the law does not apply to them – since, in practice, it does not apply to them.

Pursuant statute 18USC2381, the Government Perpetrators: the President and Cabinet, the Attorney General and his senior assistants, the Director of the FBI and his senior assistants, the Congress, the Commissioners of the SEC, the Chief Justice and Justices of the US Supreme Court, *may not* hold office under the United States. That is the law. As the matter stands today, the United States of America has an illegitimate government, according to the laws of the United States. (See the *Dossier of Crimes, Volume III, Chapter 50.5*).

## 8. STATE-SUPPORTED TYRANNY UPON THE POPULACE

The seditious conspiracy, insurrection against the laws, and treason against the nation, as concisely laid out in the pages of this Complaint, is supported by 2,400 pages of prima facie evidence presented in the Dossier of Crimes, which should be read as fully contained herein. The subversive crimes are further supported by 61 court cases and some 335 proceedings in those cases, which cases and proceedings have *all corruptly been dismissed*. In addition, there is more than 15, 000 letters that support these conclusions.

Turning a blind eye to the criminal endeavor embroiling the Boeing Company and the United States Government causes grave risk to the American people and people across the globe.

### *Risk to Investors and Financial Markets*

Because the Boeing Company *fraud and crimes are ongoing* in spite of the DOJ and USDC for Northern Texas order to Boeing to cease and desist from doing crime, the risks to the financial investment markets remain acute. That risk is potentially the partial or total loss of investment(s) value. That potential of 'total loss' amounts to \$249.88 billion, premised upon the peak market capitalization of the Boeing Company during the period of fraud, which period is 18 years. The Boeing Company's stock exchange fraud needs to be terminated.

### *Risk to Court Witnesses*

Because Boeing's violent crimes are *ongoing*, despite the laws, despite the Plea Agreement, and despite the District Court order to Boeing to desist from doing crime; and because the trap set by Boeing and their government co-conspirator for Anthony Keyter's kidnap and murder is still held in place (according to the FAA), no witness to Boeing's crimes or that of the Government, is safe. The risk of loss of life through kidnap and murder - for the prosecutor qui tam Anthony Keyter and for every other witness (or prosecutor or judge who opposes Boeing's criminality), remains acute. Boeing has attempted the murder of a witness once before, and, since there has been no deterrent or law-enforcement action, there is no reason to believe that they will not attempt that again. The Boeing Company's proclivity to violent crimes must be addressed and terminated for good.

### *Risk to Flight Safety*

Because the Boeing crimes and criminal corporate culture is *ongoing* and because Boeing's breaches of 'cease-and-desist-orders' are ongoing, the dangers to the international flying public remains as acute as they were before each of the previous four air accidents mentioned above, and before the death of 507 people and grave injury to another 189. The prosecutor



qui tam, Anthony Keyter, finds it essential to repeat his flight safety warning to all those who are in a position and who have the ability to bring rehabilitation to the Boeing Company's criminal corporate culture and thereby to secure flight safety on Boeing manufactured aircraft.

***Flight Safety Warning*** - Four common causes, stemming from the Boeing Company, have caused the death of 507 people and grave injury to another 189 in the preventable air accidents of Lion Air Flight 610, Ethiopian Airlines Flight 302; Asiana Flight 214, and Air India Flight IX-812. Many more innocent people will die needlessly in inevitable aircraft or spacecraft accidents on Boeing aircraft/spacecraft, attributable to these same avoidable causes:

- Unless the ongoing criminality within the Boeing Company and amongst its US Government co-conspirators is addressed and terminated. (See the Dossier of Crimes).
- Unless the impunity offered by the US Government to the Boeing Company, for crimes committed, is ended forthwith.
- Unless the Boeing Company's culture of 'extreme indifference to human life' is reigned in and eradicated for good. (See major contributory causes by Boeing in the accidents of Lion Air Flight 610, Asiana Flight 214, and Air India Flight IX-812.)
- Unless Boeing's corporate culture of putting its financial interests first, well before flight safety considerations, is once and for all eliminated in full. (See criminal charges in the Dossier of Crimes, Volume III, Chapter 42).

***Risk to the United States of America***

Turning a blind eye to the escalating criminal endeavor embroiling the Boeing Company and the US Government, poses grave risk to the well-being of the 'United States of America' and its international reputation. The risk to the United States can be summarized as follows:

- The death (murder) of many more people in avoidable air accidents caused by ongoing criminality within the Boeing Company.
- Massive personal losses to investors on the stock exchanges – to many investors, loss of their life-savings.
- The potential collapse of the country's most prestigious stock exchanges, the NYSE and Nasdaq. As a result ....
- Impact upon the ability of thousands of companies to raise cash and trade their shares.
- The collapse of investor confidence in the USA. And, as a further result ....
- The potential crash of the country's financial markets with concomitant impact upon the economy.
- The potential collapse of the (unlawful) US Government and its institutions;
- The suspension of Congress, where no one who is presently holding office is legal;
- Et al.

The current trajectory of the ongoing criminality is towards chaos. Should the Boeing Company / US Government criminal conspiracy not be dealt with and be terminated, that ongoing criminality represents '*a catastrophe in waiting*'.

Respectfully submitted by:



Anthony Keyter  
Prosecutor Qui Tam  
Retired Senior Instructor Pilot for Boeing

---

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of October 2024, a true and correct copy of this Motion was served on the following counsel for the parties:

United States Attorney:  
Burnett Plaza, Ste 1700  
801 Cherry Street, Unit #4  
Fort Worth, Texas 76102-6882  
[USATXN.USA@usdoj.gov](mailto:USATXN.USA@usdoj.gov)

Defendants: C/o  
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Corp. Secretary John Demers  
Boeing Corporate Offices  
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Respectfully Submitted,



Anthony P. Keyter



Anthony Keyter  
6200 Soundview Drive, R201  
Gig Harbor, WA, 98335  
Tel: 253-8533859  
Email: akeyter@centurytel.net

October 5, 2024

The Clerk  
US District Court  
501 West 10<sup>th</sup> Street, Room 310  
Fort Worth, TX 76102-3673

The Clerk,

**Re: Filing in Case No. 4:21-cr-5-O**  
**United States v. The Boeing Company**

Enclosed find a *'Motion to Disqualify Judge O'Conner'*, with its Appendix 1, filed in criminal case number **4:21-CR-5-O**. Also attached, find the 'Certificate of Service'. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keyter', with a stylized flourish at the end.

Anthony Keyter  
Boeing Crime Victim  
Prosecutor Qui Tam

Anthony Keyter  
6200 Soundview Drive, R201  
Gig Harbor, WA, 98335  
Tel: 253-8533859  
Email: akeyter@centurytel.net

October 5, 2024

Chief Judge David Godbey  
US District Court  
501 West 10<sup>th</sup> Street, Room 310  
Fort Worth, TX 76102-3673

Chief Judge Godbey,

**Re: Disqualification of Judge O'Conner from Case No. 4:21-cr-5-O,  
United States v. The Boeing Company**

Enclosed for your oversight and potential action, find a copy of a *'Motion to Disqualify Judge O'Conner'* from criminal case number **4:21-CR-5-O**, and the important Appendix 1 to that motion. You are copied so that you may have a clear understanding of the criminality *within* your District Court, perpetrated by Boeing and by the District Judge. Should Judge O'Conner fail to disqualify himself from the case, despite his criminal offenses, the obligation will fall upon you to ensure that the constitution and the laws are obeyed in your Court.

Please address the criminal complaints found as *'Affidavit'* *within* the Motion and those in Appendix 1 to the Motion, and thereby help mitigate the risks to society caused by those crimes, as described in the Appendix. Please advise me what actions have been taken, if any, on the crimes that have yet to be addressed and terminated. Failing to hear from you by return, I will assume that no action has been forthcoming from you.

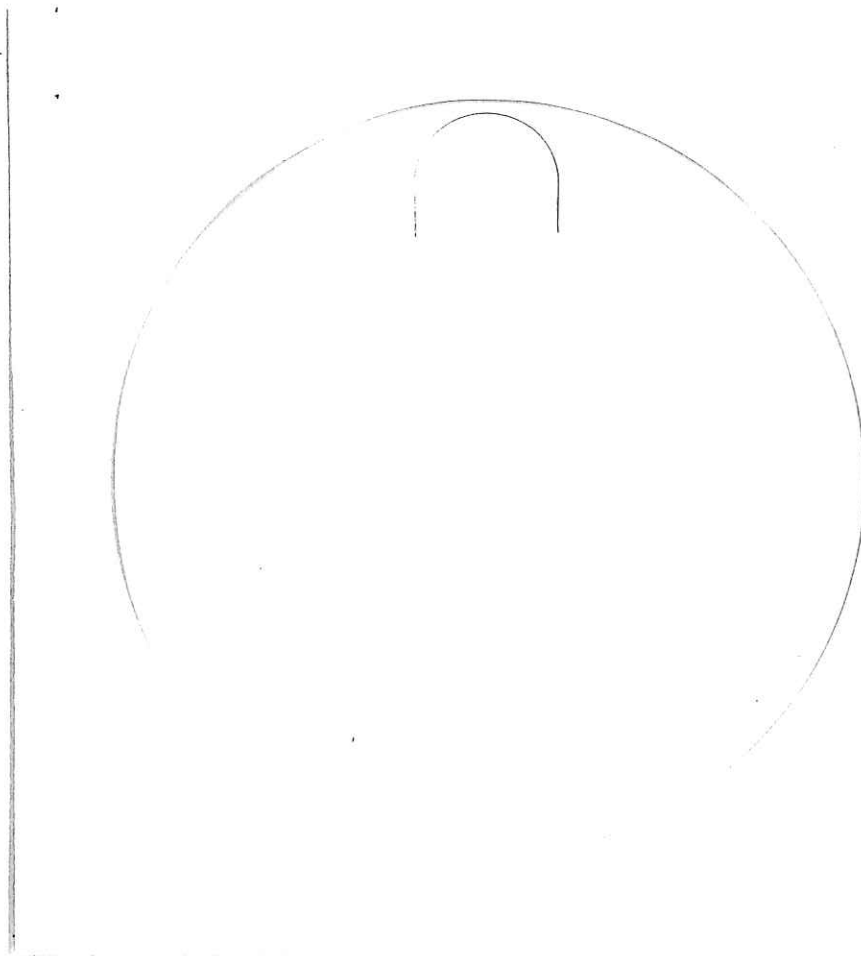
Sincerely,



Anthony Keyter  
Boeing Crime Victim  
Prosecutor Qui Tam









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US DISTRICT COURT

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FORT WORTH, TX 76102-3673

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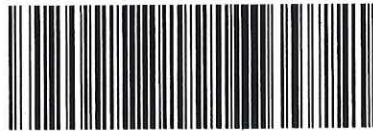
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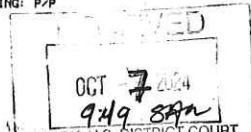
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#### Domestic Shipments

- To qualify for the letter rate, UPS Express® envelopes may only contain correspondence, urgent documents, and/or electronic media, and must weigh 8 oz. or less. UPS Express envelopes containing items other than those listed or weighing more than 8 oz. will be billed by weight.

#### International Shipments

- The UPS Express envelope may be used only for documents of no commercial value. Certain countries consider electronic media as documents. Visit [ups.com/importexport](https://www.ups.com/importexport) to verify if your shipment is classified as a document.
- To qualify for the letter rate, the UPS Express envelope must weigh 8 oz. or less. UPS express envelopes weighing more than 8 oz. will be billed by weight.

**Note:** UPS Express envelopes are not recommended for shipments of electronic media containing sensitive personal information or breakable items. Do not send cash or cash equivalent.

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